

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING
BRIEFING OF PLAINTIFFS' FORTHCOMING MOTION TO COMPEL
DOCUMENTS REDACTED ON THE BASIS OF PRC LAW**

WHEREAS, Defendant DiDi Global, Inc. ("DiDi") served its Amended First Supplemental PRC Law Redaction Log and Amended Second Supplemental PRC Law Redaction Log on June 6, 2025 and its Amended Third Supplemental PRC Law Redaction Log (collectively, the "Redaction Logs") on June 12, 2025;

WHEREAS, Plaintiffs intend to move to compel over 100 of the 766 documents listed in the Redaction Logs;

WHEREAS, given Plaintiffs' beliefs concerning the volume of documents at issue and the complexity of the issues involved, the parties require additional pages and time – beyond those allowed for discovery disputes in Your Honor's Individual Practices and Rules – to brief Plaintiffs' forthcoming motion to compel.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Plaintiffs' letter motion to compel shall be limited to eight single-spaced pages;
2. DiDi's opposition shall be limited to eight single-spaced pages and shall be filed within six business days of the filing of Plaintiffs' letter motion; and

3. Plaintiffs' reply (if necessary) in further support of their letter motion shall be limited to four single-spaced pages and shall be filed within three business days of the filing of DiDi's opposition.

Respectfully submitted,

Dated: June 24, 2025

/s/ Corey Worcester

Corey Worcester
Renita Sharma
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10038
Tel: (212) 849-7000
Fax: (212) 849-7100
coreyworcester@quinnemanuel.com
renitasharma@quinnemanuel.com

Counsel for Defendant DiDi Global, Inc.

/s/ Laurence Rosen

Phillip Kim
Laurence Rosen
The Rosen Law Firm, P.A.
275 Madison Avenue, 40th Floor
New York, New York 10016
Tel: (212) 686-1060
Fax: (212) 202-3827
philkim@rosenlegal.com
lrosen@rosenlegal.com

Lead Counsel for Lead Plaintiff and the Class

SO ORDERED.

DATED: _____

Hon. Lewis A. Kaplan, U.S. District Judge

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 24th day of June 2025, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Laurence Rosen